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May 8, 2023

***SUBMITTED ECF***

The Hon. John G. Koeltl  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

***Re: United States v. Jarel Sable, 22 Cr. 409 (JGK) and 17 Cr. 511 (JGK)***

Your Honor:

I represent Jarel Sable in the above-referenced matters. Our pretrial motions are due on Monday, May 8, 2023, however, as counsel continues to review the discovery, I have discovered new developments and needed the assistance of an investigator in connection with interviews of potential witnesses and the review of voluminous video surveillance.

We respectfully request a brief extension of the motions deadline to allow defense counsel to conduct further investigation and file pretrial motions by Friday, May 12, 2023, and the government to file their opposition motions by June 23, 2023. The government consents to this application for an extension.


Thank you for your time and consideration.

Respectfully submitted,

s/ Jacqueline E. Cistaro

cc: All Counsel

APPLICATION GRANTED  
SO ORDERED

5/8/23   
John G. Koeltl, U.S.D.J.